

Docket ID No. EPA-HQ-OW-2007-1126

Draft Plan of Action for Reducing, Mitigating, and Controlling Hypoxia in the Northern Gulf of Mexico and Improving Water Quality in the Mississippi Basin

The U.S. Department of Interior Minerals Management Service has the following comments on the Draft Hypoxia Action Plan 2008:

General Comments:

It would be desirable to have a regular reporting requirement added to the plan, such as an official annual report that would include information on the size and geographic location of the past 10 year's hypoxic zone, dates of formation and breakup, and annual runoff data from the Atchafalaya and Mississippi Rivers. This report should include a simple analysis of the effectiveness of the measures to date, should be updated on an annual basis, and made available to the public through the internet.

Specific comments:

Page 2, 3rd paragraph: The heart of the matter seems to be in the sentence "The hydrologic changes that have caused such damage to South Louisiana also exacerbate Gulf hypoxia by jetting most nutrient-rich river water and sediments directly into the Gulf of Mexico, bypassing the deltaic wetlands that require the nutrients and sediments."

Page 6, 1st full paragraph, 2nd sentence: "Resources are insufficient to attain the goals of the Action Plan and the lack of resources is the primary barrier to successful implementation of the plan." It appears that the major emphasis of the Action Plan should be toward marshalling resources. Since resources are insufficient to be independently successful, can the Action Plan serve to bolster other actions/programs that achieve results?

Page 10, Figure 6: The figure shows that the Lower Mississippi area exhibits an obvious reduction of phosphorus loading in the past five years versus the long-time average. Can we identify the factors that resulted in this difference? Even if it is not a result of the 2001 Action Plan, can we identify similar activities/actions that may be responsible for the change?

Page 12: In the first full paragraph, 2nd bullet item, add (*Action 4 of 2001 Action Plan*).

Page 18: In the 1st paragraph, 2nd sentence it states "Federal agencies will identify opportunities to align existing programs with hypoxia efforts." This is a good strategy for strong focus, not just with federal agencies, but with States and private concerns. Since funds are limited, focus on how to leverage monies, to supplement other programs, to modify private practices to achieve more efficient nutrient reduction.

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